

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH CHAN, TAMARA HOFFMAN,
RACHEL EHRENPREIS, CHAIM KATZ, WINNIE
CHEUNG, MEIR EHRENPREIS, JOHN BAILEY,
SEAN CARNEY, LUIS DIAZ AND FAMILIES FOR
A BETTER PLAN FOR CONGESTION,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, FEDERAL HIGHWAY
ADMINISTRATION, THE METROPOLITAN
TRANSPORATION AUTHORITY, THE
TRIBOROUGH BRIDGE AND TUNNEL
AUTHORITY, SHAILEN BHATT, in his official
capacity as Administrator of the Federal Highway
Administration, RICHARD J. MARQUIS, in his
official capacity as Division Administrator of the New
York Division of the Federal Highway Administration,
STEPHANIE WINKELHAKE, P.E. in her official
capacity as Chief Engineer of the New York State
Department of Transportation, WILLIAM J. CARRY
in his official capacity as Assistant Commissioner for
Policy for the New York City Department of
Transportation,

Defendants.

Case No. 23-cv-10365-LJL
[rel. 1:24-cv-01644-LJL]
[rel. 1:23-cv-10365-LJL]

DECLARATION OF ALAN KLINGER

Alan M. Klinger, an attorney duly admitted to practice before this Court, hereby declares
pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am counsel for Plaintiffs in this action, and I am familiar with the pleadings and proceedings in this action.
2. I submit this Declaration in support of Plaintiffs' motion for leave to file a Second Amended Complaint.

3. Annexed hereto as Exhibit "A" is the Proposed Second Amended Complaint.
4. Annexed hereto as Exhibit "B" is a redlined version of the Proposed Second Amended Complaint, reflecting the proposed revisions to the First Amended Complaint.

Dated: July 26, 2024
New York, New York

STEPTOE LLP

By:

/s/ Alan M. Klinger

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